# **MEMO ENDORSED**

December 1, 2020

#### Via ECF

The Honorable Katherine Polk Failla,

United States District Judge,

United States District Court for the Southern District of New York, 40 Foley Square,

New York, New York 10007.

Re: Arkansas Teacher Retirement System v. Allianz Global Investors US LLC et al, No. 20-cv-05615:

Retirement Program for Employees of the Town of Fairfield et al v. Allianz Global Investors U.S. LLC, No. 20-cv-05817;

Lehigh University v. Allianz Global Investors U.S. LLC et al, No. 20-cv-07061;

Teamster Members Retirement Plan v. Allianz Global Investors U.S. LLC et al, No. 20-cv-07154;

Blue Cross Blue Shield Association National Employee Benefits Committee v. Allianz Global Investors U.S. LLC et al, No. 20-cv-07606;

Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust et al v. Allianz Global Investors U.S. LLC et al, No. 20-cv-07842;

Chicago Area I.B. of T. Pension Plan & Trust et al v. Allianz Global Investors U.S. LLC et al, No. 20-cv-07952;

The Employes' Retirement System of the City of Milwaukee v. Allianz Global Investors U.S. LLC et al, No. 20-cv-08642;

The Chicago & Vicinity Laborers' District Council Pension Fund et al. v. Allianz Global Investors U.S. LLC et al, No. 20-cv-09478;

The Boards Of Trustees For The Carpenters Health And Security Trust Of Western Washington et al v. Allianz Global Investors U.S. LLC et al, No. 20-cv-09479; and Paul Schaefer et al v. Allianz Global Investors U.S. LLC et al, No. 20-cv-09587.

#### Dear Judge Failla:

Following the November 17, 2020 conference, and as directed in the Minute Entry on November 25, 2020, the parties in the above-captioned actions have been meeting and conferring in good faith and have made progress towards agreeing on many aspects of a joint report and case management submission. The parties request an additional two days to continue their discussions in the hopes of eliminating, or at least continuing to narrow, any areas of

disagreement so as not to burden the Court with disputes that the parties may be able to resolve through further conferrals. Accordingly, the parties respectfully request a two-day extension of time from December 1, 2020 until December 3, 2020 to submit the joint report on the proposed framework. No prior requests for an extension have been made.

#### Respectfully submitted,

#### /s/ Hannah Ross

Hannah Ross Avi Josefson James Harrod Michael Blatchley BERNSTEIN LITOWITZ BERGER AND GROSSMANN LLP 1251 Avenue of the Americas

New York, NY 10020 Telephone: (212) 554-1400 Facsimile: (212) 554-1444

Co-Counsel for Plaintiff Arkansas Teacher Retirement System

Counsel for Plaintiff Employees' Retirement System of the City of Milwaukee; Chicago & Vicinity Laborers' District Council Pension Fund and the Chicago & Vicinity Laborers' District Council Health & Welfare Fund, and Catherine Wenskus, Administrator; The Boards of Trustees for the Carpenters Health and Security Trust of Western Washington and for the Group Investment Trust of the Carpenters Individual Account Pension Trust of Western Washington and Carpenters Retirement Trust of Western Washington

/s/ Fredric S. Fox

Fredric S. Fox
Donald R. Hall
Melinda Campbell
Aaron Schwartz
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022
Telephone: (212) 687, 1980

Telephone: (212) 687-1980 Facsimile: (212) 687-7714

# /s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.
Stephanie G. Wheeler
Kathleen Suzanne McArthur
Ann-Elizabeth Ostrager
Hilary M. Williams
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004-2468

Telephone: (212) 558-4000 Facsimile: (212) 558-3588

Counsel for Defendants

#### /s/ Robert A. Skinner

Robert A. Skinner Amy D. Roy Mary Elizabeth Brust Cole A. Goodman ROPES & GRAY LLP Prudential Tower 800 Boylston Boston, MA 02199

Telephone: (617) 951-7000 Facsimile: (617) 951-7050

Co-Counsel for Defendant Allianz Global Investors U.S. LLC Co-Counsel for Plaintiff Arkansas Teacher Retirement System

Co-Counsel for Plaintiffs Chicago Area I.B of T. Pension Plan & Trust and Local 703 I.B. of T., Grocery and Food Employees' Pension Plan & Trust

#### /s/ David S. Golub

David S. Golub Steven L. Bloch Ian W. Sloss SILVER GOLUB & TEITELL LLP 184 Atlantic Street Stamford, CT 06901

Telephone: (203) 325-4491 Facsimile: (203) 325-3769

Counsel for Plaintiffs Retirement Program for Employees of the Town of Fairfield and Retirement Program for Fairfield Police and Firemen's Retirement System

#### /s/ Jonathan L. Hochman

Jonathan L. Hochman
Matthew A. Katz
Jenny C. Gu
SCHINDLER COHEN & HOCHMAN LLP
100 Wall Street, 15th Floor
New York, NY 10005

Telephone: (212) 277-6300 Facsimile: (212) 277-6333

Counsel for Plaintiff Lehigh University

# /s/ William C. Fredericks

William C. Fredericks
(wfredericks@scott-scott.com)
Donald A. Broggi (dbroggi@scott-scott.com)
Zachary M. Vaughan
(zvaughan@scott-scott.com)

#### /s/ Renita Sharma

Renita Sharma
Richard Irving Werder, Jr.
Andrew Peter Marks
Michael Ethan Liftik
QUINN EMANUEL URQUHART &
SULLIVAN LLP
51 Madison Avenue
22nd Floor
New York, NY 10010
Telephoner (212) 840, 7412

Telephone: (212) 849-7413 Facsimile: (212)-849-7100

Counsel for Defendant Aon Investments USA Inc. f/k/a Aon Hewitt Investment Consulting, Inc.

#### SCOTT + SCOTT ATTORNEYS AT LAW

LLP

The Helmsley Building 230 Park Avenue, 17th Floor

New York, NY 10169

Telephone: (212) 223-6444 Facsimile: (212) 223-6334

Counsel for Plaintiff Teamster Members Retirement Plan f/k/a GCIU Inter-Local Pension Plan and Bricklayers and Masons' Local Union No. 5, Ohio Pension Fund

#### /s/ Daniel Z. Goldman

Daniel Z. Goldman (dgoldman@pkbllp.com) PETRILLO KLEIN & BOXER LLP 655 Third Avenue, 22nd Floor New York, NY 10017

Telephone: (212) 370-0330

#### /s/ Sean W. Gallagher

Sean W. Gallagher Adam L. Hoeflich Mark S. Ouweleen Abby M. Mollen Nicolas L. Martinez BARTLIT BECK LLP 54 West Hubbard Street, Suite 300 Chicago, IL 60654

Telephone: (312) 494-4400

Counsel for Plaintiff Blue Cross and Blue Shield Association National Employee Benefits Committee

#### /s/ Javier Bleichmar

Javier Bleichmar
George N. Bauer
BLEICHMAR FONTI & AULD LLP
7 Times Square, 27th Floor
New York, New York 10036

Telephone: (212) 789-1340 Facsimile: (212) 205-3960

#### /s/ Regina Calcaterra

Regina Calcaterra Justin Teres CALCATERRA POLLACK LLP 1140 Avenue of the Americas, 9th Floor New York, New York 10036 Telephone: (212) 899-1760

Counsel for Plaintiffs Metropolitan
Transportation Authority Defined Benefit
Pension Plan Master Trust, Manhattan and
Bronx Surface Transit Operating Authority
Pension Plan, and Metropolitan
Transportation Authority Other
Postemployment Benefit Plan

#### /s/ Scott F. Hessell

Scott F. Hessell John Bjork Ashima Talwar Sperling & Slater, P.C. 55 West Monroe Street, Suite 3200 Chicago, Illinois 60603 Telephone: (312) 641-3200

Co-Counsel for Plaintiffs Chicago Area I.B of T. Pension Plan & Trust and Local 703 I.B. of T., Grocery and Food Employees' Pension Plan & Trust

#### /s/ Justin S. Brooks

Justin S. Brooks GUTTMAN, BUSCHNER & BROOKS PLLC 119 Coulter Ave., Suite 211 Ardmore, PA 19003 Telephone: (610) 827-0041

/s/ Elizabeth H. Shofner

GUTTMAN, BUSCHNER & BROOKS PLLC 41-30 46<sup>th</sup> Street, Apt 1-0 Ardmore, PA 19003 Telephone: (202)-800-3001

#### /s/ Reuben A. Guttman

Reuben A. Guttman GUTTMAN, BUSCHNER & BROOKS PLLC 2000 P Street, N.W., Suite 300 Washington, DC 20036 Telephone: (202)-800-3001

# /s/ Jonathan D. Karmel

Jonathan D. Karmel KARMEL LAW FIRM 221 N. La Salle Street, Suite 1550 Chicago, IL 60601 Telephone: (800)-459-6264

#### /s/ Kenneth A. Wexler

Kenneth A. Wexler Mark J. Tamblyn WEXLER WALLACE LLP 55 W. Monroe Street, Suite 3300 Chicago, IL 60603 Telephone: (312)-346-2222

Co-Counsel for Plaintiffs Paul Schaefer and Robert O'Toole; Marc Parker; Brian Jordan; Mark Jacobs; and William R. Seehafer, as trustees of the United Food & Commercial Workers Unions & Employers Midwest Pension Fund

cc: Counsel of Record (by ECF)

# Case 1:20-cv-09479-KPF Document 43 Filed 12/01/20 Page 7 of 7

Application GRANTED. The Clerk of Court is directed to docket this Order in case numbers 20-cv-5615, 20-cv-5817, 20-cv-7061, 20-cv-7154, 20-cv-7606, 20-cv-7842, 20-cv-7952, 20-cv-8642, 20-cv-9478, 20-cv-9479, and 20-cv-9587.

Dated: December 1, 2020

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

Katherin Palle Fails